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8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 JOHN DOE, individually,  
12 Plaintiff,

13 vs

14 RANALLI, ZANIEL, FOWLER & MORAN,  
LLC, a Nevada Limited Liability Company,  
15 DOES I-X, and ROE CORPORATIONS I-X,  
inclusive,  
16 Defendant.

CASE NO. 2:17-cv-02556-JAD-CWH

**STIPULATION AND ORDER TO  
EXTEND CLOSE OF DISCOVERY  
AND DISPOSITIVE MOTION  
DEADLINES**

**(First Request)**

18 The parties, by and through their respective counsel of record, hereby stipulate and agree as  
19 follows:

20 1. On January 23, 2018, this Court entered an Order granting the Stipulated Discovery  
21 Plan and Scheduling Order submitted by the parties.

22 2. This is the first request by the parties to amend the Court's January 23, 2018  
23 Scheduling Order.

24 3. The parties stipulate and agree to extend the close of discovery deadline for thirty-  
25 five (35) days for the sole purpose of conducting party and percipient witness depositions, some of  
26 which are out-of-state, that are necessary to fully evaluate the claims and defenses presented.

27 4. The parties further stipulate and agree that the dispositive motion and pre-trial order  
28 deadlines shall also be extended pursuant to LR 26-1.

1           5.       The parties further stipulate and agree that the period to propound written discovery  
2 requests shall not be extended by this Stipulation and Order.

3                   **STATEMENT OF DISCOVERY THAT HAS BEEN COMPLETED**

4           1.       Plaintiff served the following disclosures:

- 5               a.       Initial Disclosures on January 23, 2018;  
6               b.       First Supplemental Disclosures on February 16, 2018;  
7               c.       Second Supplemental Disclosures on March 2, 2018.

8           2.       Defendant served the following disclosures:

- 9               a.       Initial Disclosures on January 23, 2018;  
10              b.       First Supplemental Disclosures on April 9, 2018;  
11              c.       Second Supplemental Disclosures on April 16, 2018;  
12              d.       Third Supplemental Disclosures on April 20, 2018;  
13              e.       Fourth Supplemental Disclosures on April 23, 2018;  
14              f.       Fifth Supplemental Disclosures on May 4, 2018.

15          3.       Plaintiff served the following discovery requests:

- 16              a.       First Set of Request for Production of Documents. Defendant's response is  
17                      due on May 17, 2018;  
18              b.       First Set of Interrogatories. Defendant's response is due on May 17, 2018;  
19              c.       First Set of Requests for Admissions. Defendant's response is due on May  
20                      17, 2018;  
21              d.       Second Request for Production of Documents. Defendant's response is due  
22                      on June 4, 2018.

23          4.       Defendant served the following discovery requests:

- 24              a.       First Set of Interrogatories. Plaintiff responded on February 16, 2018;  
25              b.       First Set of Request for Production of Documents. Plaintiff responded on  
26                      February 16, 2018.

27          5.       Completed depositions: Plaintiff John Doe.  
28

1                   **STATEMENT OF DISCOVERY THAT REMAINS TO BE COMPLETED**

2           The parties are currently in the process of responding to written discovery requests that were  
3 served on or before May 4, 2018, subpoenaing third-party documents, and coordinating party and  
4 percipient witness depositions. The remaining depositions consist of Defendant's founding and  
5 managing partners, Defendant's office manager, two (2) associates employed by Defendant,  
6 Plaintiff's out-of-state treating physician, and three (3) insurance adjusters, two of which are also  
7 located out-of-state. Due to counsels' conflicting schedules, and multiple out-of-state witnesses,  
8 additional time is needed to coordinate and complete the remaining depositions. For the above stated  
9 reasons, the parties request that the discovery deadline be extended thirty-five (35) days from June  
10 4, 2018 to July 9, 2018 for the sole purpose of conducting necessary depositions.

11                   **PROPOSED SCHEDULE**

12           The parties stipulate and agree that:

13           1.     **Discovery**: The discovery period shall be extended thirty-five (35) days from June  
14 4, 2018 to July 9, 2018 for the purpose of deposition.

15           2.     **Dispositive Motions**: The deadline to file dispositive motions shall not be later than  
16 thirty (30) days after the discovery cut-off date. Therefore, the dispositive motion deadline shall be  
17 extended from July 5, 2018 to August 8, 2018.

18           3.     **Pre-Trial Order**: If no dispositive motions are filed, the Joint Pretrial Order shall  
19 be filed thirty (30) days after the date set for the filing of dispositive motions. Therefore, the Joint  
20 Pretrial order shall be extended from August 5, 2018 to September 7, 2018. In the event dispositive  
21 motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days  
22 after decision on the dispositive motions or by further order of the Court.

1 This stipulation and order is sought in good faith and not for the purpose of delay. No prior  
2 request for any extension of scheduling deadlines has been made.

3 Dated: May 11, 2018  
4 JACKSON LEWIS P.C.

Dated: May 11, 2018  
ARIAS SANGUINETTI WANG & TORRIJOS

5 /s/ Dione C. Wrenn  
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*John Doe*

**ORDER**

IT IS SO ORDERED

  
UNITED STATES DISTRICT JUDGE

Dated: May 15, 2018